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November 17, 2004

***Filed Electronically***

Ms. Marlene H. Dortch  
Secretary of the Commission  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

RE: *Hearing Aid-Compatibility Report (WT Docket No. 01-309)*

Dear Ms. Dortch:

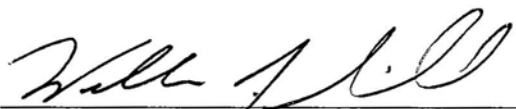
Pursuant to the Commission's *Hearing Aid-Compatibility Report and Order*,<sup>1</sup> attached please find a Hearing Aid-Compatibility status report submitted on behalf of Inland Cellular Telephone Company ("Inland"), the general partner of Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership.

Please do not hesitate to contact the undersigned with any questions that you may have at (202) 783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By:

  
\_\_\_\_\_  
William J. Sill  
Catherine Fox

Attachment

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<sup>1</sup> Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, WT Docket No. 01-309, *Report and Order*, 18 FCC Rcd 16753 (2003).

# **HEARING AID-COMPATIBILITY STATUS REPORT**

**November 17, 2004**

**Eastern Sub-RSA Limited Partnership  
Licensee of:**

**WA5 (B2) Washington 5 - Kittitas RSA  
Call Sign: KNKQ283**

*and*

**Washington RSA No. 8 Limited Partnership  
Licensee of:**

**WA8 (B) Washington 8 - Whitman RSA  
Call Sign: KNKN489**

**ID1 (B2) Idaho 1 - Boundary RSA  
Call Sign: KNKQ400**

**ID2 (B2) Idaho 2 - Idaho RSA  
Call Sign: KNKR305**

Inland Cellular Telephone Company ("Inland"), the general partner of Eastern Sub – RSA Limited Partnership and Washington RSA No. 8 Limited Partnership (collectively "the Partnerships"), hereby provides the Commission with the Hearing Aid-Compatibility Status Report ("Report"), as required by the Commission's *Hearing Aid-Compatible Report and Order*.<sup>1</sup> Inland is submitting this report, on behalf of the Partnerships, in order to provide the Commission with the current status of the Partnerships' efforts and progress toward compliance with the Commission's hearing aid-compatibility requirements. In preparing the instant Report, Inland followed the guidelines the Commission set forth in its *Hearing Aid-Compatible Report and Order*.<sup>2</sup>

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<sup>1</sup> Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, WT Docket No. 01-309, *Report and Order*, 18 FCC Rcd 16753 (2003).

<sup>2</sup> *Id.* at ¶ 89.

**Licensee Name and Contact Information:**  
**Eastern Sub-RSA Limited Partnership**  
**Washington RSA No. 8 Limited Partnership**

c/o

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**Licensee's Relationship to Equipment Manufacturers:**

As stated in its May 17<sup>th</sup> Hearing Aid-Compatibility Status Report,<sup>3</sup> the Partnerships, as small carriers, do not purchase a sufficient number of handsets to be allowed to buy directly from the handset manufacturers. Instead, the Partnerships must rely on 'middle-men' or third party vendors who purchase new handsets from manufacturers and then sell them to small carriers. The Partnerships regularly purchase handsets from the following third party vendors: Brightpoint, Cellstar, IDCOMM and Aerovoice. Currently, the Partnerships stock handset models from the following equipment manufacturers: Nokia, Kyocera, Motorola, LG and Audiovox.

The Partnerships' attenuated relationship with equipment manufacturers adversely impacts the Partnerships in several respects. First, it is difficult to obtain up-to-the-minute information concerning equipment manufacturers' planned offerings. Second, prior experience with E911 Phase II ALI equipped handsets has shown that this distant relationship results in the Partnerships receiving the newer more desirable handset models long after the larger CMRS carriers receive them.

**Licensees Hearing Aid-Compatibility Efforts to Date:**

Inland, on behalf of the Partnerships, has kept abreast, as best it can, with hearing aid-compatible handset offerings. As recently as this week Inland contacted several of the above mentioned third party vendors and equipment manufacturers and requested the latest information related to the status of manufacturers' plans to provide hearing aid-compatible handsets and the progress of the ATIS (Alliance for Telecommunications Industry Solutions) Working Group's assessment and test methodology for the ANSI C63.19 standard. As noted below, presently the Partnerships are able to provide new phone subscribers with a limited number of hearing aid-compatible handset models. In addition, Inland continues to implement and refine its customer outreach efforts.

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<sup>3</sup> See Hearing Aid-Compatibility Status Report for Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership, filed May 17, 2004 ("May 17<sup>th</sup> Status Report").

**Phone Models which Manufacturers State are Hearing Aid-Compatibility Compliant and ANSI C63.19 Rating:**

Based on Inland's efforts to gather equipment information from its third party vendors and equipment manufacturers, Inland understands that at least one Kyocera handset offered by the Partnerships is hearing aid-compatibility compliant:

Model #:        ANSI C63.19

KX414            No standardized testing method currently available to determine compliance.

**Phone Models that Manufacturers State are Compatible with Hearing Aids:**

Based on Inland's efforts to gather equipment information from its third party vendors, Inland understands that along with the hearing aid-compatible Kyocera offering, Motorola offers integrated earpiece speakers ("dynamic speaker") that will couple with and be compatible with telecoil equipped hearing aids in all its current wireless phones. In addition, Motorola offers a hands free loop-set accessory. The loop-set is a headset that plugs into a handset and is worn around the subscriber's neck. The loop-set wirelessly retransmits the audio signals through the loop-set back to the hearing aid.<sup>4</sup>

**Retail Availability of Compliant Phones:<sup>5</sup>**

Out of the eleven handset models the Partnerships presently offer,<sup>6</sup> three handset models are hearing aid-compatibility compliant. Inland and the Partnerships currently offer the Kyocera KX414. This hearing aid-compatibility compliant handset represents 11% of the total number of handset models currently purchased by the Partnerships' subscribers. In addition, the Partnerships' most recent sales numbers reflect that two of its Motorola handset models have dynamic speakers (Motorola T731c and the Motorola V60) which Motorola states render them compatible with telecoil equipped hearing aids.

**Total Number of Compliant Phones Offered:**

The Partnerships calculate that approximately 32% of the phones provided to new subscribers are the Kyocera hearing aid-compatibility compliant phones and the Motorola dynamic speaker equipped phones.

**Total Number of Non-Compliant Phones Offered:**

The remaining eight (8) handset models offered by the Partnerships are not hearing aid-compatibility compliant. The Partnerships are pleased to report that there are several different types of accessories that can be used to make non-compliant handsets more compatible with

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<sup>4</sup> While the Partnership offers several Motorola models that it believes also have these hearing aid-compatibility features, it could only confirm, as of the date of this Report, that two of the Motorola models offered through the Partnerships possess these features (the Motorola V60s and the Motorola T731c).

<sup>5</sup> For the purposes of the Hearing Aid-Compatibility Status Report, the Partnerships are considering both the Kyocera and the Motorola models identified below as being 'hearing aid-compatible.'

<sup>6</sup> The Partnerships offer 11 handset models, however, older handset inventory is also retained for purchase by subscribers.

hearing aids. Based on its review of available literature, the Partnerships believe that many of their other handset offerings would be compatible with loop-sets as well as with the Plantronic's hands-free headset.<sup>7</sup> The Partnerships currently offer both these accessories to their subscribers. In addition, the Partnership is investigating the potential to purchase and offer the Hearing Aid Telephone Interconnect System ("HATIS") as an accessory for subscriber's with hearing aids.<sup>8</sup>

**Information Regarding Differences in Handset Offerings Among Regions in Service Areas (For Service Providers Only):**

The Partnerships are small carriers with four systems located in two adjacent states. Thus, while the Partnerships have not noticed any discrepancies in the handset offerings between the four systems, the Partnerships do not feel that the systems are sufficiently numerous or distant from one another such that a meaningful response can be provided to this question.

**Efforts to Incorporate Hearing Aid-Compatibility into Newer Models:**

As noted above, Inland understands that certain manufacturers, such as Motorola, offer handsets with integrated dynamic speakers that will allow for coupling with hearing aid telecoils making the handsets compatible with these hearing aids.

**Activities Related to ANSI C63.19 or other Standards of Work:**

Inland and the Partnerships will continue to keep abreast of developments in hearing aid-compatible handsets through third party vendors, review of manufacturer's publicly available documents, consultation with its counsel, and interfacing with industry organizations of which Inland is a member.

**Ongoing Efforts for Interoperability Testing with Hearing Aids:**

Due to their status as small carriers, the Partnerships are reliant upon handset manufacturers and industry standards groups to work towards a standard for interoperability testing as well as to conduct such tests.

**Product Labeling Information:**

The Partnerships are able to provide their subscribers with new handsets through their retail cellular stores and through third party agents that sell their products.<sup>9</sup> The Partnerships understand and will comply with the Commission's requirement that service providers ensure that information concerning hearing aid-compatible handsets, and more particularly a handset's U-Rating, is made visible to their subscribers.

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<sup>7</sup> Plantronic's hands-free headset, which is similar in function to a loop-set, appears to be compatible with telecoil-equipped hearing aids.

<sup>8</sup> The HATIS is a small device that fits over the subscriber's ear next to the hearing aid and plugs directly into the audio jack of a wireless handset.

<sup>9</sup> The Partnerships' agents generally sell Partnership provided handsets. One exception, however, is Tracfone, a pre-paid cellular reseller of the Partnership's services that acquires and sells its own handsets. Tracfone's handsets are branded as Tracfone handsets rather than as the Partnerships or Inlands' handsets. Thus, the Partnerships are not able to monitor nor control Tracfone's self-branded handsets.

## **Outreach Efforts**

Since filing their May 17<sup>th</sup> Status Report with the Commission, the Partnerships have trained their retail employees to identify and provide information regarding hearing aid-compatible handsets and accessories, such as the loop-set accessory, to the Partnerships' current and prospective subscribers. The Partnerships believe that one of the most effective ways to disseminate information to its consumers is at the point of sale. The Partnerships will continue to educate their retail staff on hearing aid-compatibility issues and the developing technology offered through the equipment manufacturers, so that their retail staff can continue to function as a source of reliable and current information.

The Partnerships intend to build on their efforts to educate both their potential subscribers and their current subscribers on the hearing aid-compatible phones being offered:

- The Partnerships have begun to supply their retail staff with informational materials concerning the compliant handsets and accessories. In the future, the Partnerships will increase the amount of informational literature they make available at the Partnerships' retail stores concerning compliant handsets and accessories; and
- Inland is currently working to update its web site to make hearing aid-compatible related information available on Inland Cellular Telephone's web site, calling attention to the hearing aid-compatible handsets offered, their capabilities and other details regarding the compliant handsets. Inland intends to add the hearing aid-compatible content to its web site by December 31, 2004.